



**U.S. Department of Justice**

Antitrust Division

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June 30, 2017

ECF & HAND DELIVERY

Honorable Richard Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: U.S. v. Richard Usher et al, 17-Crim-019 (RMB)

Dear Judge Berman,

We represent the United States in the above-referenced case. Enclosed are copies of agreements between the United States and each defendant – Richard Usher, Rohan Ramchandani, and Christopher Ashton. The agreements set forth the pretrial release conditions that the parties will jointly recommend and ask the Court to impose at the defendants' initial appearance and arraignment, scheduled for July 17, 2017 at 11:30 a.m. Also enclosed are Affidavits that each defendant will execute prior to his appearance before the Court, setting forth, among other things, his agreement to waive extradition and appear in this action voluntarily.

The enclosed agreements are the product of several months of research and negotiation by the United States and counsel for the defendants. We believe the recommended pretrial release conditions, including the posting of monetary security by the defendants, will reasonably assure the appearance of each defendant as required throughout the progress of this criminal case and are the least restrictive means of doing so, pursuant to 18 U.S.C. § 3142(c). We also note that these agreements were important to the successful negotiation of voluntary appearances by the defendants, all of whom are citizens and residents of the United Kingdom.

We would be happy to make ourselves available to the Court for any discussion of this matter prior to July 17th, if the Court wishes.

Sincerely yours,



Carrie A. Syme  
Trial Attorney

Jeffrey D. Martino  
Chief, New York Office

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Enclosures:

- (A) Agreement and Affidavit for Richard Usher
- (B) Agreement and Affidavit for Rohan Ramchandani
- (C) Agreement and Affidavit for Christopher Ashton